

# **Exhibit 1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

DEMOCRACY NORTH CAROLINA;  
NORTH CAROLINA BLACK ALLIANCE;  
LEAGUE OF WOMEN VOTERS OF  
NORTH CAROLINA,

CASE NO.  
1:23CV00878-TDS-  
JEP

Plaintiffs,

vs.

ALAN HIRSCH, in his official  
capacity as CHAIR OF THE STATE  
BOARD OF ELECTIONS; JEFF  
CARMON III, in official  
capacity as SECRETARY OF THE  
STATE BOARD OF ELECTIONS;  
STACY EGGERS IV, in his  
official capacity as MEMBER OF  
THE STATE BOARD OF ELECTIONS;  
KEVIN LEWIS, in his official  
Capacity as MEMBER OF THE  
STATE BOARD OF ELECTIONS;  
SIOBHAN O DUFFY MILLEN, in her  
official capacity as MEMBER OF  
THE STATE BOARD OF ELECTIONS;  
KAREN BRINSON BELL, in her  
official capacity as EXECUTIVE  
DIRECTOR OF THE STATE BOARD OF  
ELECTIONS; NORTH CAROLINA  
STATE BOARD OF ELECTIONS,

Defendants.

VIDEOTAPED 30(b)(6) DEPOSITION OF  
NORTH CAROLINA ELECTION INTEGRITY TEAMS  
By JAMES K. WOMACK, JR.

(Taken by Plaintiffs)

Raleigh, North Carolina

September 19, 2024

Reported by Andrea L. Kingsley, RPR

1 if the person voted and the address verification  
2 was rejected, you can't undo the vote. So the  
3 vote -- there were examples of people that voted  
4 through same day registration that voted and then  
5 the address wasn't verified and there's nothing you  
6 can do to correct that because the vote counted the  
7 and the canvass was over.

8 Q. Do you remember what statutory code --  
9 let me say what the scheme at the time -- what in  
10 the way of requirements on the county boards of  
11 elections for the timing of those mailers the scheme  
12 had?

13 A. I don't recall.

14 Q. If I said it just required that there  
15 was those mailers were sent in a reasonable amount  
16 of time, would that sound right to you?

17 A. Probably. Yes.

18 Q. Do you have any awareness of how 747  
19 changed that language?

20 A. 747 required -- by the way, this was not  
21 our suggestion. Not our suggestion. This is not  
22 an NCEIT thing, this appeared in 747. Just to  
23 clarify the record, my organization, after studying  
24 the same day registration thoroughly, my  
25 organization advocated for elimination of same day

1 registration as all other southern states did. We  
2 were the only southern state doing it and I was  
3 arguing that we should not do it as well because of  
4 the disparate treatment of voters because now  
5 you're treating same day registrants differently  
6 than you treat normal voters. But the 747  
7 provision was to verify the address through mailer  
8 which I never -- I was never consulted on that and  
9 nobody in my organization was consulted and we  
10 would have disagreed with that, but that's not --  
11 there are many things that happened that we don't  
12 agree with.

13 Q. We're going to get to all of that. I  
14 promise.

15 A. I'm sure we will.

16 Q. But it's your understanding that the  
17 post 747 timing of that mailer changed or no?

18 A. It did. Absolutely did. A judge ruled  
19 that that was impractical, Judge Schroeder ruled  
20 that was impractical because -- and it is. As a  
21 matter of fact. If someone votes on Saturday,  
22 you're not going to get a verification before  
23 Monday or Tuesday. It's just not going to happen  
24 before the canvass. So I understand that.  
25 Especially with the US Postal Service these days.

1 STATE OF NORTH CAROLINA

2 WAKE COUNTY

3 REPORTER'S CERTIFICATE

4 I, Andrea L. Kingsley, a Notary Public  
5 in and for the State of North Carolina, do hereby  
6 certify that there came before me on Thursday, the  
7 September 19, 2024, the person hereinbefore named,  
8 who was by me duly sworn to testify to the truth  
9 and nothing but the truth of their knowledge  
10 concerning the matters in controversy in this  
11 cause; that the witness was thereupon examined  
12 under oath, the examination reduced to typewriting  
13 under my direction, and the deposition is a true  
14 record of the testimony given by the witness.

15 I further certify that I am neither  
16 attorney or counsel for, nor related to or employed  
17 by, any attorney or counsel employed by the parties  
18 hereto or financially interested in the action.

19 IN WITNESS WHEREOF, I have hereto set  
20 my hand this the 5th day of October, 2024.

21  
22  
23 \_\_\_\_\_  
24 Andrea L. Kingsley, Notary Public

25 Notary Public #201903800023